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June 28, 2023

VIA E-MAIL

Honorable Philip Bentley
United States Bankruptcy Court
Southern District of New York
One Bowling Green New York, NY 10004-1408

**Re: Pretty Girl, Inc., Chapter 7 Case No. 14-11979-PB
Salvatore LaMonica, as Chapter 7 Trustee of Pretty Girl, Inc.,
v. 72 Fashion Corp., et al., Adv. Pro. No. 16-01150 PB
Administratively Consolidated**

Dear Judge Bentley:

We represent Albert Nigri and write in response to Lon Seidman's letter to the Court, requesting the entry of an order directing that Mr. Nigri appear for an in-person deposition pursuant to the subpoena issued by the trustee in connection with his post-judgment discovery.

Remarkably, although Mr. Seidman has informed the Court that we have asked the trustee to examine Mr. Nigri by written questions rather than in person based upon a letter from Mr. Nigri's physician, which we provided to Mr. Seidman, he neglected to provide the Court with a copy of the letter. In so doing, he has denied the Court the opportunity to make an informed decision.

I have enclosed a copy of the letter. As you can see, Mr. Nigri is under the care of a physician because he suffers from convulsive seizures which are brought on by stress and suffers from a cognitive impairment that places additional stress on him.

Because Mr. Nigri indeed had a convulsive seizure during a previous in person deposition, which I attended with him, his physician has recommended that the trustee's proposed examination be conducted in writing because it would be a less stressful environment.

While we understand the trustee's preference for an in-person examination as a less burdensome option, that preference must not trump the interests of Mr. Nigri in avoiding risks to his health.

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In view of the foregoing, we ask that the Court deny the trustee's request and direct that the trustee proceed by way of written questions.

Thank you.

Respectfully,

Rosen & Associates, P.C.

By: /s/ Sanford P. Rosen

cc: Lon Seidman